

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

David Goulding, Howard Salamon, Robin Goulding)
and John O'Shea)

Plaintiffs)

vs.)

Mark Miller)

Defendant)

) Case No. 1:22-cv-05224

) Judge Sharon Johnson Coleman

) Magistrate Judge Finnegan

AFFIDAVIT OF MARK MILLER

I, Mark Miller, being first duly sworn on oath state that if called to testify in this matter, I would competently testify to the following facts based on personal knowledge, information, and belief, as follows:

1. While acting as the CEO and director of Capitol Capital Corporation ("CCC"), I sold its shares of Indo Global Exchange ("IGEX") stock in November and December of 2019 and early 2020. I did not personally receive or take control of the proceeds of the sales. The proceeds were deposited in CCC's operating account.
2. I never received or had ownership interest in any common shares of CCC pursuant to a stock purchase agreement.
3. Randall Goulding acted as legal counsel to CCC from its inception in 2012. Randall Goulding prepared the Wyoming reincorporation document that was filed with the State of Wyoming on October 6, 2019, which indicates that I was made Chairman of the Board of CCC. I subsequently became CEO of CCC.
4. I was told by both Randall Goulding and David Goulding prior to November 30, 2019 that they were no longer interested in participating in the management of CCC because they were involved in the SEC v. Nutmeg, et al, litigation.

Affiant further sayeth naught.



Mark Miller

Dated: 07/16/2025

VERIFICATION BY CERTIFICATION

I, Mark Miller, being first duly sworn on oath deposes and states that under penalties as provided by law under 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein on information and belief and as to such matters, the undersigned certifies that he believes the same to be true.

A handwritten signature in black ink, appearing to read 'Mark Miller', is written over a horizontal line.

Mark Miller

Dated: 07/16/2025